

<b>Document Title:</b>	9120 Summary of Changes
<b>Issue:</b>	June 12, 2024

<b>Standard Number:</b>	IA9120 Coordination Draft
<b>Standard Issue:</b>	
<b>Standard Title:</b>	Quality Management Systems – Requirements for Aviation, Space, and Defense Distributors

<b>Introduction</b>	The 9120 writing team has developed a 9120 Coordination Draft	
<b>Section</b>	<b>Detail of the change</b>	<b>Rationale</b>
<b>Intended Application</b>	Added clarification that distributor organizations can have agreements with original manufacturers or can procure products on the open market. Separated lengthy sentences to clearly distinguish that distributors can use customer controlled external providers to perform processes on products. Additionally distributors can use regulatory or customer controlled external providers to maintain/repair products.	Improves understanding of distributor organizations and their scope
<b>Intended Application</b>	Added statement that the 9120 standard may be integrated with organizations that conform to 9100 or 9110 and distribute products.	Encourages use of 9120 standard for 9100/9110 organizations that include distribution in their scope
<b>3.3</b>	Added Authorized/Original Manufacturer definition	Clarification for this term used in the 9120 standard
<b>3.4</b>	Counterfeit Part definition – updated to align across the 9100-series	Streamlines and clarifies counterfeit part definition
<b>3.5</b>	Distributor – updated distributor definition to include that distributor organizations can provide <a href="#">sales</a> , purchasing, storage, splitting, kitting or <a href="#">packaging</a> , without affecting product conformity or characteristics. Added distributor types 3.5.1 – Authorized (Franchised) Distributor 3.5.2 – Independent Distributor 3.5.3 - Broker	Improves understanding of distributor organizations and their scope. Added distributor type definitions to reinforce that there are many varied distributor business models. Broker definition acknowledges that brokers are a type of distributor and if certified, are not exempt from any of the 9120 requirements and must be able to

		demonstrate that they have processes for things like traceability, in spite of not having stock.
<b>3.</b>	Added Kitting definition	Defines kitting, including specifying “without altering product characteristics”, since kitting can be included in distributor scope of activity
<b>3.</b>	Updated Product Safety definition	Clarifies requirement to “maintain” product safety.
<b>3.</b>	Updated Splitting definition	Clarifies splitting is the separation of product into smaller units.
<b>3.</b>	Updated Suspected Unapproved Part definition	deleted “credible” evidence (not auditable)
<b>4.3</b>	Added requirement for Scope definition to include the type(s) of distribution services (e.g. authorized (franchised), independent, broker)	Improves understanding of distributor organizations and their scope.
<b>5.1.2.d</b>	Deleted ... <del>product and</del> service conformity...	Distributors should not be affecting <u>product</u> conformity, but should ensure <u>service</u> conformity is measured and action taken if planned results are not achieved.
<b>5.3</b>	Removed title for Management Representative but retained functional responsibilities	Identical to ISO 9001 for basic QMS, and kept organizational freedom and unrestricted access to top management.
<b>7.1.5</b>	Consolidated and restructured requirements for measuring and test equipment at distributors; deleted NOTE on personally owned and customer equipment used to provide evidence of conformity...	Redefined and simplified minimum requirements for monitoring and measuring resources; reinforces that distributors are not responsible for establishing product conformity, but do provide a level of verification.

<b>7.1.7</b>	Added Information Security requirements	New clause for all IA9100 series of standards
<b>7.3</b>	Consolidated and restructured awareness topics for distributors; added “maintaining” product safety	“maintaining” product safety aligns with product safety definition for distributors
<b>7.5.3</b>	Added documented information requirements for splitting; added examples of documented information for distributors	Retaining documented information on splitting is important for distributors.
<b>8.1.a</b>	<p>8.1.a NOTE (Determination of requirements) reorganized</p> <ul style="list-style-type: none"> <li>• Various requirements/notes eliminated for distribution: <ul style="list-style-type: none"> <li>• 8.1.b NOTE (statistical techniques) eliminated</li> <li>• 8.1.g (determining product from external providers) eliminated</li> <li>• NOTE (method for operational planning and control) eliminated</li> <li>• NOTE (project planning) eliminated</li> </ul> </li> </ul> <p>Restated/clarified requirement for transfer of work</p>	<p>Reordered 8.1.a bullets to flow better in distributor context</p> <p>8.1.b Statistical techniques is n/a for distribution</p> <p>8.1.g – n/a for distribution</p> <p>Restated and clarified requirement for transfer of work “when there is a need”</p>
<b>8.1.2</b>	<p>Deleted verbiage not pertinent to distribution.</p> <p>8.1.2.a revised from “control” to “maintain” product identification and traceability</p> <p>8.1.2.b revised to ensure documented information matches configuration condition</p> <p>8.1.2.c added for management of substitution, obsolete or superseded products</p>	<p>8.1.2.a – emphasizes that configuration management must support maintaining product traceability</p> <p>8.1.2.c reinforces requirements for substitutions and management of obsolete/superseded parts</p>
<b>8.1.4</b> <b>8.1.5</b>	<p>NOTE items are now requirements, including but not limited to training, traceability of parts, test methodologies, monitoring, and segregation/containment/ reporting</p> <p>Added examples of appropriate personnel for training</p>	Strengthened counterfeit parts and suspect unapproved parts requirements
<b>8.2.3.1.f</b>	added requirement to determine that external providers can meet applicable requirements of the product	Distributors must determine that the external providers can

		conform to customer requirements
<b>8.4.1</b>	Added NOTE for Risks that can include products ordered from other than an authorized or original manufacturer or authorized distributor, suspect unapproved or counterfeit parts, etc.	Removed sub-tier supplier control requirement - Covered in Traceability 8.5.2. Clarified NOTE and added authorized/OEM agreements for distribution as a selection criteria
<b>8.4.2</b>	Updated and reordered NOTE (Verification activities) to add review of Authorized Release Certificate, deleted review of production part approval process, statistical data	Modified requirements for verification activities to align with distributor responsibility
<b>8.4.3</b>	8.4.3.a - Added “configuration definition or revision” to the technical data examples Reorganized 8.4.3.i to communicate “the need to” (soft) requirements and created section 8.4.3.1 to communicate specific (hard) requirements to external providers Added 8.4.3.1.b requirement to be notified of any change to external provider’s QMS certification status Deleted 8.4.3.h for use of statistical techniques	8.4.3.a - Providing configuration definition/revision is very important for distributor flowdown to external providers 8.4.3.i / 8.4.3.1 - Reordered the “as applicable” flowdown requirements vs. 8.4.3.1 Mandatory flowdown requirements for distributors. Also tied back to 8.2.3.1.f to ensure customer requirements get to the supply chain. 8.4.3.1.b – reinforces/ties back to 8.4.1 NOTE for selection/monitoring criteria
<b>8.5.1</b>	8.5.1.a NOTE 1 – eliminated 8.5.1.a NOTE 2 – added examples of documented information 8.5.1.c – struck out “for product acceptance” 8.5.1d NOTE includes clarity and alignment with clause 8.5.1.1; added examples of infrastructure	8.5.1.a Notes deleted/reworded to be more applicable to distribution 8.5.1.c – while distributors do monitoring/measurement activity, distributors do not really “accept” product

		8.5.1.d – reworded suitable infrastructure to be more applicable for distributor activity
<b>8.5.1.1</b>	8.5.1.1 added examples of equipment and tooling to be maintained	Modified storage requirements for distributor applicability; examples are more pertinent to distribution
<b>8.5.3</b>	Added requirement for documented information of customer or external provider property to be maintained	Added requirements to maintain records of location, quantity and condition.
<b>8.5.4</b>	Moved requirements to maintain infrastructure for product storage, and to maintain product preservation in accordance with specifications/requirements from 8.5.1 to 8.5.4	More appropriate in 8.5.4 Preservation
<b>8.5.4</b>	Moved requirement to control/segregate unserviceable product from serviceable product from 8.5.2 to 8.5.4 Deleted “cleaning”	More appropriate in 8.5.4 Preservation Distributors should not be “cleaning” product (potential to damage product or introduce FOD).
<b>8.5.6</b>	Removed production-oriented requirement for approval of production/service changes	More appropriate for 9100 manufacturing organization than distribution, so matching ISO 9001
<b>8.6</b>	Added NOTE to clarify that required documented information can be provided to customer or regulatory authority on release	Previous 8.6 NOTE for a certifying statement was confusing; new NOTE is a cleaner, more simple statement
<b>8.6</b>	Refocused requirements for documented information to include identification and traceability of products (8.5.2), quantities delivered, customer purchase orders	Requirements for documented information emphasizes identification/traceability of products with a pointer back to 8.5.2
<b>8.7</b>	Clarification of controls for scrap disposal	Clarified that scrap can be controlled either internally or disposed of by external provider

<b>Annex A.5</b>	Added clarification for 8.3 Design applicability for Distributors	Provided clarification for distributor design of services for customers and provided examples of services